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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X		
THE ASSOCIATED PRESS,	:	
	:	
<i>Plaintiff,</i>	:	No. 1:08-CV-000323 (PKC)
	:	ECF CASE
v.	:	
	:	
ALL HEADLINE NEWS CORP., ET AL.,	:	
	:	
<i>Defendants.</i>	:	
-----X		

**DEFENDANTS' MOTION AND NOTICE OF MOTION  
TO DISMISS UNDER FEDERAL RULE OF CIVIL PROCEDURE 12**

PLEASE TAKE NOTICE THAT Defendants All Headline News Corp., AHN Media Corp., W. Jeffrey Brown and Danielle George hereby respectfully move this Court before the Honorable P. Kevin Castel, on a date and time as soon as counsel may be heard, for an order dismissing Counts I and III to VII against all defendants pursuant to Federal Rule of Civil Procedure 12(b)(6), and dismissing the Complaint in its entirety against individual defendants

Brown and George under Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6), for the reasons stated in the accompanying Memorandum of Law.

Dated: February 29, 2008  
New York, New York

Respectfully submitted,

By: s/ Atul R. Singh  
Eric A. Prager (EP-0964)  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Defendants' Motion and Notice of Motion to Dismiss Under Federal Rule of Civil Procedure 12 was submitted to the Court's CM/ECF system on February 29, 2008 for service through the Court's Electronic Transmission Facilities upon the following:

**Andrew Lawrence Deutsch**  
**Christine M. Jaskiewicz**  
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*Counsel for Plaintiff*

s/ Atul R. Singh  
By: Atul R. Singh